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Federal Communications Commission  
Office of the Secretary

December 16, 1991

ORIGINAL  
FILE

Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, DC 20554

RE: PETITION FOR RULE MAKING  
RM-7869

Dear Ms. Searcy:

Please find enclosed one original and five copies of my  
comments on the above captioned matter. Sufficient copies  
are enclosed to insure each Commissioner receives a copy.

Respectfully submitted,

*Steven L. Wallis*

Steven L. Wallis, WA6PYE  
10326 Wagonroad West  
Corona, CA 91719

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Federal Communications Commission  
Office of the Secretary

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of:  
Amendment of Part 97 of the  
Commission Rules Governing  
Amateur Radio Services  
Regarding Repeater and  
Auxiliary Operation in the  
1.25 Meter Band

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To: The Commission

PETITION AGAINST RULE MAKING

I, Steven L. Wallis, WA6PYE, hereby submit my request to the Federal Communications Commission to NOT take action on this Petition For Rule Making, as submitted by the American Radio Relay League.

There are some very important reasons why the Commission should maintain its current position of allowing voluntary frequency coordination to prevail in the amateur 1.25 meter band. The American Radio Relay League (ARRL), in its proposal, has managed to undermine the current Commission trend toward self regulation. The adoption of this rule would needlessly displace thousands of active amateur operators currently using the 1.25 meter band in this country's metropolitan communities. The net result would be less usage of the spectrum. It is my understanding that this is not the current goal of the Commission.

As the Commission knows, signals in the 1.25 meter band can only propagate for a distance of no more than 200 miles under the best of conditions. Therefore a station doing Weak Signal experiments in Albuquerque New Mexico would be unaffected by repeater operations in Los Angeles California. Similarly, a station in Flagstaff Arizona engaging in Earth Moon Earth (EME) communications with a station in Sacramento California would also not be affected by repeater operations in the southern California area.

Judging by the representation present at the 220 Mhz Spectrum Management Association meetings, it is clear that those amateurs wishing to do Weak Signal, EME, or other similar work in the 1.25 meter amateur band in southern California represent much less than one percent of the amateurs currently using the 1.25 meter band in this area. Also it would seem that most other parts of the United States of America (USA) are well suited to allow Weak Signal and EME work. There is little overcrowding of the 1.25 meter spectrum over most of the country.

It appears that voluntary coordination of amateur frequencies